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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

TS-OPTICS CORPORATION,

Plaintiff,

v.

MICROSOFT CORPORATION,

Defendant.

Case No. 8:24-cv-01974-DOC-DFM

**DECLARATION OF BENJAMIN
T. WANG IN SUPPORT OF
PLAINTIFF'S OPENING CLAIM
CONSTRUCTION BRIEF**

To be heard by Special Master via
Zoom

Hearing Date: October 9, 2025

Hearing Time: 10:00 a.m. Pacific

I, Benjamin T. Wang, declare and state as follows:

1. I am a member of the State Bar of California and an attorney at the firm of Russ, August & Kabat, counsel of record for Plaintiff TS-Optics Corporation in the above-captioned action. I submit this declaration in support of Plaintiff's Opening Claim Construction Brief. I have personal knowledge of the facts set forth herein, and if called upon to testify, could and would testify competently thereto.

2. Attached as Exhibit 1 is a true and correct copy of U.S. Patent No. 7,266,055, issued on September 4, 2007.

3. Attached as Exhibit 2 is a true and correct copy of U.S. Patent No. 9,612,709, issued on April 4, 2017.

4. Attached as Exhibit 3 is a true and correct copy of an excerpt from the Petition for *Inter Partes* Review of U.S. Patent No. 7,266,055 in *Microsoft Corporation v. TS-Optics Corporation*, IPR2025-00767, filed on March 31, 2025.

5. Attached as Exhibit 4 is a true and correct copy of an excerpt from the Declaration of Masud Mansuripur, Ph.D., in Support of Petition for *Inter Partes* Review of U.S. Patent No. 7,266,055 in *Microsoft Corporation v. TS-Optics Corporation*, IPR2025-00767, dated March 27, 2025.

6. Attached as Exhibit 5 is a true and correct copy of the Declaration of Steve Shen, Ph.D. in Response to Declaration of Dr. Ronald Barrett, dated August 8, 2025.

7. Attached as Exhibit 6 is a true and correct copy of a USPTO Office Action from Application No. 10/849,190, mailed on January 5, 2007.

8. Attached as Exhibit 7 is a true and correct copy of a USPTO Notice of Allowance from Application No. 10/849,190, mailed on April 27, 2007.

9. Attached as Exhibit 8 is a true and correct copy of a USPTO Utility Patent Application from Application No. 13/924,186, submitted on June 21, 2013.

10. Attached as Exhibit 9 is a true and correct copy of a USPTO Office Action from Application No. 13/924,186, dated January 13, 2016.

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11. Attached as Exhibit 10 is a true and correct copy of an Amendment Under 37 CFR §1.111 from Application No. 13/924,186, dated April 12, 2016.

12. Attached as Exhibit 11 is a true and correct copy of a USPTO Office Action from Application No. 13/924,186, dated June 22, 2016.

13. Attached as Exhibit 12 is a true and correct copy of the definition of “server” from the Oxford English Dictionary, produced by Microsoft in this case.

14. Attached as Exhibit 13 is a true and correct copy of the definition of “client” from the Oxford English Dictionary, produced by Microsoft in this case.

15. Attached as Exhibit 14 is a true and correct copy of a screenshot of the definition of “client from OED.com, taken on August 26, 2025.

16. Attached as Exhibit 15 is a true and correct copy of the Microsoft Computer Dictionary, 5th Edition, produced by Microsoft in this case.

17. Attached as Exhibit 16 is a true and correct copy of an excerpt from the Declaration of Dr. Ronald Barrett in Support of Defendant’s Opening Claim Construction Brief, dated July 25, 2025.

18. Attached as Exhibit 17 is a true and correct copy of the definition of “filter” from the Oxford English Dictionary, produced by Microsoft in this case.

I declare under penalty of perjury pursuant to the laws of the United States that the foregoing is true and correct.

Executed this 4th day of September, 2025 at Los Angeles, California.

By: /s/ Benjamin T. Wang
Benjamin T. Wang